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November 26, 2024

**VIA ECF**

Honorable Magistrate Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Government Employees Ins. Co., et al. v. Tristate Psychology, et al.*  
Case No.: 23-cv-04091-RER-LB

Dear Magistrate Judge Bloom:

As the Court is aware, we represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company, and GEICO Casualty Co. (collectively "Plaintiffs" or "GEICO") in the above-referenced matter. Plaintiffs, together with Defendants Nazim Tariverdiev, Kianan Tariverdiev, Vladislav Stoyanovsky, Dmitriy Khavko, Eduard Pakoys, and Financial Vision Capital Group II LLC ("Financial Vision")(collectively, "Defendants")(collectively, with Plaintiffs, the "Parties"), respectfully submit this joint letter to update the Court on the status of this action. See Dkt. Order Dtd. Oct. 17, 2024.

Since the October 17, 2024 status conference with the Court, Financial Vision has filed its answer to the Amended Complaint and the Parties have been proceeding with written discovery in accordance with the Court's discovery schedule. D.E.74. Plaintiffs have also produced all discovery obtained from the defendants who have been dismissed from the case and in response to third party subpoenas.

As reflected in the affidavit of service, Plaintiffs served Defendant Gary Grody, also known as Lance Grody ("Grody") with the Amended Complaint and accompanying documents on October 16, 2024. See D.E. 70. To date, Grody has failed to respond to the Amended Complaint or otherwise appear in the case despite acknowledging receipt of the Amended Complaint pleadings via email. As a result, Plaintiffs anticipate requesting a certificate of default against Grody in the next week.

We thank the Court for its attention to this matter.

Very truly yours,

RIVKIN RADLER LLP

*/s/ Alexandra Wolff*

Alexandra Wolff, Esq.

cc: Counsel of record (via ECF)